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Attorneys for Creditor
Starch Concrete, Inc.

THE UNITED STATES BANKRUPTCY COURT
THE NORTHERN DISTRICT OF CALIFORNIA—SAN FRANCISCO

In re:)	CASE NO:	19-30088 (DM)
PG&E CORPORATION,)	Chapter 11	
—and—)	(Lead Case)	
PACIFIC GAS AND ELECTRIC COMPANY,)	(Jointly Administered with Case No. 10-	
Debtors.)	30089 DM)	
<input type="checkbox"/> Affects PG&E Corporation)	STARCH CONCRETE INC.'S RESPONSE	
<input type="checkbox"/> Affects Pacific Gas and Electric)	TO OBJECTION TO CLAIM (FIFTH	
Company)	OMNIBUS OBJECTION, DKT. NO. 8759);	
<input checked="" type="checkbox"/> Affects both Debtors)	DECLARATION OF ELI UNDERWOOD	
)	HEARING:	SEP. 22, 2020
)	TIME:	10:00 A.M.
)	DEPT:	17
* All papers shall be filed in the Lead Case,)		
No. 19-30088 (DM))	[RELATES TO DKT NO. 8759 AND CLAIM	
)	NOS. 78979 AND 74056]	

Claimant Starch Concrete, Inc. ("Starch") is a concrete subcontractor in the construction field. Starch asserts claims against both Debtors, PG&E Corporation and Pacific Gas and Electric Company, in the amount of no less than \$377,308 in order to secure payment for construction work actually performed and materials actually provided for three different properties in Northern California.

The Prime Clerk claims docket reflects two claims for Starch in that amount, with claim numbers 78979 and 70456. The Fifth Omnibus Objection (Court Docket Number 8759) proposes to expunge the claim against PG&E Corporation (No. 78979), while



1 preserving the claim against Pacific Gas and Electric Company (No. 70456) as the
2 "Surviving Claim."

3 Starch reviewed the two claims on the Prime Clerk website, and Prime Clerk's
4 docket summary of those claims. Each of Starch's claims include an explanatory set of
5 exhibits, including the contracts at issue that show the ownership of the property where
6 Starch provided materials and services.

7 Starch disagrees with the objection as it appears that the contracts at issue state
8 that the owner of the properties at issue is actually PG&E Corporation, and not Pacific Gas
9 and Electric Company. As such, Starch opposes the proposed expungement of its claim
10 (No. 78979) against PG&E Corporation.

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12 DATED: September 8, 2020

Respectfully submitted,

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15 By: /S/ Eli Underwood
16 ELI UNDERWOOD
17 **KROGH & DECKER, LLP**
18 Attorneys for Starch Concrete, Inc.
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DECLARATION OF ELI UNDERWOOD

I, Eli Underwood, declare as follows:

1. I am over the age of 18 years, competent to testify, and have personal knowledge of the information contained here.

2. I am an attorney at law duly licensed to practice before all the courts of the State of California, and admitted to practice before the United States Bankruptcy Court for the Northern District of California.

3. I am outside counsel for claimant Starch Concrete, Inc. ("Starch") and assisted my client with the preparation of its proofs of claims.

4. I reviewed the Fifth Omnibus Objection and then reviewed Starch's proofs of claim forms submitted to the Prime Clerk website.

5. The support for Starch's claims includes exhibits evidencing their validity.

6. It appears that the exhibits are linked to or associated only with claim number 78979, which is the claim proposed to be expunged.

7. Starch opposes the expungement of claim number 78979

I declare that the above is true and correct under the penalty of perjury under the laws of the United States of America.

Dated: September 8, 2020

/s/ Eli Underwood
Eli Underwood

